

EXHIBIT 1

EXCERPTS FROM THIRD AMENDED COMPLAINT

Defendants herein, some of whom act in the shadows, are ultimately responsible for the damages caused by the actions of their terrorist agents and clients. (TAC p.199)

Osama bin Laden and his sponsors, promoters, financiers, co-conspirators, aiders and abettors in the September 11, 2001 terrorist acts are fundamentally rooted in what the overwhelming majority of Islamic thinkers consider to be an illegitimate perversion of Islam. The charitable, financial, religious, and political networks that front terror – the Defendant banks, charities, financial and business institutions – are responsible for the death and injuries of September 11, 2001. These Defendants, who aided, abetted, sponsored, conspired to sponsor, financed or otherwise provided material support to Osama bin Laden, al Qaeda, and international terrorism must be held accountable. (TAC pgs. 202-203)

Defendants knew or reasonably should have known they were providing material support to terrorists and terrorist organizations who committed the September 11, 2001 savagery that murdered thousands of innocent people. Defendants clearly knew, or clearly should have known, they were providing material support, aiding and abetting and enabling the terrorists that brutalized America and the world on September 11, 2001. By knowingly, purposely, recklessly and in many instances maliciously engaging in international terrorist activity, Defendants acts were a proximate cause of the events of September 11, 2001, for which they are jointly and severally liable. They must be held accountable. Those providing financial resources and weapons, *inter alia*, to known terrorists who openly pronounced their intention to continue to murder innocent people, specifically American citizens, were on notice of the violence such sponsorship would cause. The sponsorship of international terrorism was reasonably anticipated to cause additional senseless murders of innocent people such as those that occurred on September 11, 2001. (TAC pgs. 216-217, emphasis added.)

This Court has both personal and subject matter jurisdiction over the Defendants herein. (TAC ¶1)

All Plaintiffs herein were killed and injured as a direct and proximate cause of the acts of these criminals, the acts of their al Qaeda co-conspirators and sponsors, and the acts of Defendants herein to sponsor these reasonably foreseeable acts. (TAC ¶11)

Osama bin Laden, his co-conspirators, aiders and abettors, and material sponsors have engaged in a global conspiracy aimed at the United States and other Western targets. Al Qaeda has also acted as a kind of umbrella organization providing support for other terrorist groups. (TAC ¶ 493, emphasis added.)

Like the Defendants herein, the Additional Defendants knew or reasonably should have known they were aiding and abetting or providing material support to terrorists and terrorist organizations who committed the September 11, 2001 savagery that murdered thousands of innocent persons. (TAC ¶632)

Like the Defendants herein, the Additional Defendants engaged in negligent, grossly negligent, and/or intentional acts and breaches of duty which proximately caused the deaths and injuries of September 11, 2001. (TAC ¶633)

Additional Defendants include terrorist individuals, charities, banks, businesses, associations, entities, organizations front groups or any other parties as of yet unidentified who engaged in the

material sponsorship, aiding and abetting of the September 11, 2001 attacks, Osama bin Laden, al Qaeda and/or international terrorism. (TAC ¶634)

The Defendants herein engaged in acts of international terrorism; activities that involve violent acts dangerous to human life that are in violation of the criminal law of the United States and appear to be intended to intimidate or coerce a civilian population; to influence policy of a government by intimidation or coercion; or to affect the conduct of a government by assassination. (TAC ¶646)

As set forth above, Defendants, jointly, severally and proximately caused the deaths and injuries described herein through and by reason of acts of international terrorism, the aiding and abetting international terrorism, conspiring to commit further acts of international terror, engaging in criminal enterprise to promote international terrorism through illegal schemes, and/or the material support and sponsorship of international terrorism. (TAC ¶649)

As set forth above, Defendants aided, abetted, conspired, or otherwise engaged in or provided material support for the acts of international terrorism, including but not limited to providing material support and/or aiding and abetting assistance to Osama bin Laden, al Qaeda, and international terrorism. This material support and/or aiding and abetting of acts of international terrorism allowed al Qaeda to carry out the terrorist attacks on the United States on September 11, 2001. (TAC ¶650)

As a result of Defendants' acts in furtherance of international terrorism, including but not limited to financial sponsorship, training, education, travel, logistical or any other material support, all Plaintiffs suffered damages as set forth herein. (TAC ¶651)

As the Defendants, individually, jointly and severally, aided and abetted, sponsored, financial, promoted, fostered, materially supported, or otherwise conspired to proximately cause the death and injury of innocent persons namely the Plaintiffs herein through and by reason of acts of international terrorism – the heinous attacks of September 11, 2001. These terrorist acts constitute a clear violation of the law of nations, otherwise referred to as customary international law, which includes international legal norms prohibiting mass murder, genocide, torture, air piracy, and terrorism. (TAC ¶654)

As a result of the Defendants' activities set forth above in violation of the customary international law norms of the law of nations, the Plaintiffs suffered injury and damages as set forth herein. (TAC ¶655)

As a result and proximate cause of the Defendants' sponsorship of terrorism in violation of the law of nations and customary principles of international law, the Plaintiffs suffered injury and damages as set forth herein. (TAC ¶656)

Plaintiffs herein bring this consolidated action pursuant to F.R.C.P. 42 for the wrongful death proximately caused by the Defendants engaging in, materially supporting or sponsoring, financing, aiding and abetting, scheming and/or otherwise conspiring to commit or cause to occur acts of murder and wrongful death, specifically, the mass murder committed by the terrorist attacks acts of September 11, 2001. (TAC ¶659)

The Defendants, unlawfully, willfully and knowingly combined, conspired, confederated, aided and abetted, tacitly and/or expressly agreed to participate, cooperate and engage in unlawful and

tortious acts pursuant to a common course of conduct, namely the promotion and sponsoring of international terrorism, resulting in the death and injury of Plaintiffs. (TAC ¶678)

The Defendants conspired with, encouraged, furthered and agreed to provide material support, funding, sponsorship, aiding and abetting and/or other material resources to al Qaeda, Osama bin Laden, and the ends of international terrorism in furtherance of this conspiracy. (TAC ¶679)

The Defendants engaged in a commonly motivated, organized, concerted and conspirational acts, efforts, transactions, material support, and activities designed, intended, and foreseeably to cause acts of international terrorism including the terrorist attack on the United States, its citizens and society on September 11, 2001. Co-conspirators herein continue in their quest to attack the United States, resulting in the harm to Plaintiffs, which was done pursuant to and furtherance of this concert of action, agreement, enterprise, civil and criminal conspiracy and common scheme. (TAC ¶680)

Defendants' concert of action, scheme, enterprise and conspiracy to support and promote Osama bin Laden, al Qaeda and international terrorism was a proximate cause of the September 11, 2001, terrorist attacks that killed and injured the Plaintiffs. (TAC ¶681)

Defendants knowingly and substantially assisted in the sponsorship of Osama bin Laden, al Qaeda, international terrorism and the September 11, 2001 terrorist attacks that killed and injured the Plaintiffs herein. (TAC ¶684)

At the time of such aiding and abetting, Defendants knew or should have known that its role was part of an overall and ongoing illegal, criminal and/or tortious activity. (TAC ¶685)

As set forth above, the Defendants aided and abetted in concerted efforts, transactions, acts and activities designed to cause the attacks of September 11, 2001, on the United States, its citizens, foreign citizens, its liberties and freedoms. (TAC ¶686, emphasis added.)

The Defendants' aiding and abetting of international terrorism through material sponsorship was a proximate cause of the September 11, 2001 terrorist attacks that killed and injured the Plaintiffs. (TAC ¶687)

The actions of the Defendants, acting in concert or otherwise conspiring to carry out, aid and abet these unlawful objectives of terror, were intentional, malicious, unconscionable, and in reckless disregard of the rights and safety of all Plaintiffs. Defendants, acting individually, jointly, and/or severally intended to carry out actions that would brutalize or kill the Plaintiffs. (TAC ¶716)